APPENDIX 2B

ADAPTIVE MANAGEMENT PLAN

SMOKY CANYON MINE

PANELS F & G

LEASE AND MINE PLAN MODIFICATION PROJECT

ADAPTIVE MANAGEMENT PLAN

WATER MANAGEMENT FACILITIES

December 2014

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ACRONYMS AND ABBREVIATIONS

ACRONYM/ABBREVIATION	DEFINITION
AME	Active Minerals Extraction
AMP	Adaptive Management Plan
BLM	Bureau of Land Management
BMPs	best management practices
CAP	Corrective Action Plan
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
COPCs	Contaminants of Potential Concern
Corps	U.S. Army Corps of Engineers
CQC	Construction Quality Control
DEIS	draft environmental impact statement
EIS	environmental impact statement
EPA	Environmental Protection Agency
FEIS	final environmental impact statement
GCLL	geo-synthetic clay laminate liner
GWQR	Ground Water Quality Rule
IDEQ	Idaho Department of Environmental Quality
MSGP	Multi Sector General Permit
NFS	National Forest System
NOC	naturally occurring constituent
NPDES	National Pollution Discharge Elimination System
ODA	Overburden Disposal Area

ACRONYM/ABBREVIATION	DEFINITION
QA/QC	Quality Assurance/Quality Control
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
Simplot	J.R. Simplot Company
SWPPP	Stormwater Pollution Prevention Plan
USFS	U.S. Forest Service
WQMP	Water Quality Management Plan

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1.0 INTRODUCTION AND BACKGROUND

This Adaptive Management Plan (AMP) has been developed for the Panels F and G Lease and Mine Plan Modification Project (the Project) at the Smoky Canyon Mine to address water management issues during and after the Project. This document is responsive to comments from the Environmental Protection Agency (EPA) on the Draft Environmental Impact Statement (DEIS) prepared by the Bureau of Land Management (BLM), Pocatello Field Office and the U.S. Forest Service (USFS), Caribou-Targhee National Forest (CTNF) with cooperation from the Idaho Department of Environmental Quality (IDEQ) for this Project (BLM and USFS 2014).

The J.R. Simplot Company's (Simplot) Smoky Canyon Mine is an open pit phosphate mine that has been operating since 1983. It is located about 10 miles southwest of Afton, Wyoming, in Caribou County, Idaho (Appendix A - Figure 1). Mining is conducted using standard open pit techniques and then concentrating the phosphate content of the ore in an onsite mill. Tailings from the milling operation are disposed in two on-site permitted tailings disposal ponds located on private land owned by Simplot. Water management activities have been ongoing throughout operations, and include such practices as containing tailings, recycling process water, rerouting stormwater and retaining sediment, as well as numerous best management practices (BMPs).

It was previously recognized that there is some inherent potential for mobilization of certain elements that are naturally present in the geologic materials once they become exposed through mining; however, elevated selenium concentrations in both surface waters and groundwater water were discovered downgradient of the existing Smoky Canyon Mine in the mid-1990s. Since that time, water management practices have continued to evolve to better protect water resources.

Selenium is the primary element characterized in the ongoing Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) investigations at the Smoky Canyon Mine. It has been found to be more spatially ubiquitous and in more elevated concentrations than other contaminants of potential concern (COPCs). Thus, among the COPCs, selenium is key from an exposure risk standpoint and it is also considered to be an appropriate COPC indicator for the site (Formation Environmental 2014). Mining and reclamation design at the mine now focuses on isolating seleniferous waste and minimizing its contact with precipitation and runoff. The Project reflects that focus.

As described in **Chapter 2** of the final EIS (FEIS), Simplot has proposed to: 1) enlarge the existing Panel G lease to accommodate the expansion of the previously approved East overburden disposal area (ODA); 2) modify the approved mine plan for Panel F to allow for construction and use of an ore conveyance system between Panel F and the existing mill; 3) increase the ODA on the southwest side of Panel G for the temporary storage of chert to be used for reclamation; and 4) utilize a geo-synthetic clay laminate liner (GCLL) in Panel G instead of the currently approved geologic store and release cover. The Agency Preferred Alternative (Section 2.7 of the EIS)) would reduce the proposed lease modification area, reduce the disturbance area associated with the expanded East ODA, and utilize a mixed geologic store and release cover/GCLL. This AMP is based upon the Agency Preferred Alternative rather than Simplot's original proposal.

This Project includes the same types of approaches to water management as are currently being used at the mine. The overall approach is that water management structures capture and control water (e.g., precipitation and runoff) that contracts mine materials so that it does not mix with and significantly degrade other waters. In addition, the use of the proposed GCLL would further minimize contamination of surface and groundwater over the long term.

2.0 OBJECTIVES

The overarching goal of this AMP is to provide a plan for the adaptive management of any water quality issues that may occur specifically as a result of the Project both during operations and after reclamation. The purpose of the AMP is to establish specific contingencies and practices in the event that monitoring shows exceedance of numeric water quality standards for various constituents.

3.0 CONSULTATION

Several agencies are party to the EIS and/or have active roles in environmental permitting/compliance issues at the Smoky Canyon Mine. This AMP addresses the individual and collective concerns of those agencies.

The BLM administers the federal phosphate leases associated with the Smoky Canyon Mine and issues decisions related to the development of those leases. The BLM also coordinates with the applicable land management agencies, which in this case is the USFS. The USFS makes recommendations to the BLM concerning surface management and mitigation on leased lands within the CTNF, and issues decisions on special use authorizations for off-lease activities. The BLM and USFS are the lead agencies for the EIS, and they will make separate but coordinated decisions related to this Project.

EPA is responsible for administering the National Pollution Discharge Elimination System (NPDES) program under Section 402 of the Clean Water Act. Simplot currently has permit coverage for stormwater discharges under EPA's NPDES Multi-Sector General Permit (MSGP) for industrial stormwater discharges.

The U.S. Army Corps of Engineers (Corps) has regulatory jurisdiction over waters of the U.S., including wetlands, under Section 404 of the Clean Water Act. Simplot currently maintains Corps permits for activities at the Smoky Canyon Mine; however, since no impacts to waters of U.S. would occur from the Project, no amendments or revisions to the existing permits are anticipated.

IDEQ administers Section 401 of the Clean Water Act, which includes issues related to compliance with Idaho water quality standards for streams. IDEQ also implements and ensures compliance with groundwater quality standards. In January of 2008, Simplot entered into a Consent Order with IDEQ that defined an active mineral extraction area (AME) for the Panels F and G Project. The Consent Order would still be applicable to the Project; however, the proposed change to the lease boundary would require an amendment of the AME area.

All of these agencies (with the exception of the Corps) as well as the Bureau of Indian Affairs are signatories to the previously mentioned CERCLA investigations at the Smoky Canyon Mine. As such, water management and this AMP are subjects of specific interest to them.

4.0 WATER MANAGEMENT PLAN

4.1 PANEL G AREA

Under the Agency Preferred Alternative, Simplot would construct numerous stormwater features in the Panel G area. This would include 13 settling ponds, two infiltration basins on the reclaimed limestone within the pit boundary, and ditches/channels as conceptually presented in Appendix A - Figure 2. The design criteria and operational strategy is the same as is currently used for the existing ponds in other areas of the Smoky Canyon Mine, which builds upon past experience with water management strategies and the resultant water quality implications.

During construction of the East ODA, stormwater would be managed to reduce or eliminate contact with ROM and material would be left at angle of repose (i.e., not sloped) in order to minimize infiltration of snowmelt and stormwater. Once the slope is covered with a GCLL, runoff and sediment control facilities would be located off the ODA to the extent feasible in order to protect the reclaimed slope from erosion and damage related to heavy equipment use.

Drainage and diversion ditches would be constructed to either divert run-on water around disturbance areas or to collect and route stormwater to infiltration basins or settling ponds. While BMPs would minimize erosion that would contribute to sediments transported in runoff, directing runoff to sediment ponds allows sediments to be captured and contained. These ponds would be designed and maintained to provide total retention for the runoff from the 100-year, 24-hour storm event. For conservatism in the design process, no interception/infiltration considerations are made: 100 percent of the precipitation falling within a given contributing area is assumed to run off. Table 1 provides pond and infiltration basin design storage capacities and information used to derive those capacities.

The ponds would be used to collect stormwater and snow melt runoff exclusively; no other waste streams would be allowed to enter the ponds and/or commingle with this runoff. However, some of the runoff collected would not be overland flow, but instead would be precipitation that has infiltrated through the drainage layer at the top of the GCLL, collected in drainage pipes (the lateral cover drain system), and then discharged to the surface water ditch/sediment pond system. The intent is to provide a relatively rapid flow-through for water that is prevented from percolating through the GCLL, which is designed to inhibit percolation, thereby preventing contact between water and the underlying seleniferous waste materials.

Table 1 Panel G Stormwater Pond Volumes and Design Information

POND ID	CONTRIBUTION AREA (ACRES)	RUN-OFF VOLUME (ACRE-FEET)	POND VOLUME (ACRE-FEET)
1	5.7	1.4	1.6
2	187.0	46.8	51.9
3	15.4	3.9	8.9
4-9	45.0	11.2	11.2
10	15.1	3.8	5.2
11	3.2	0.8	2.0
12	2.4	0.6	0.7
13	58.2	14.6	17.8
14*	7.3	1.8	4.0
15*	250.2	62.6	40.9

*Ponds 14 and 15 are designed as infiltration basins.

While the sediment ponds would not routinely discharge, this may occur infrequently due to heavy precipitation and runoff events. Such discharge of stormwater is allowed under Simplot's existing stormwater permit. If discharge does occur, some of the suspended solids would have settled out in the pond prior to discharge so that the concentration of solids in the discharge would be less compared to the incoming concentrations. To control any such releases, all ponds would be designed with stable spillways so that any discharge would not erode the spillways or instigate structural failure of the ponds. Discharges would be sampled and assessed for COPCs as discussed in the StormWater Pollution Prevention Plan (SWPPP) that is required by the stormwater permit. This monitoring is discussed in Section 4.4, as is other surface water monitoring in downstream receiving waters.

Two infiltration basins would be constructed within the portion of the Panel G pit that would be backfilled with non-seleniferous material. That portion of the pit would receive a more tradition topsoil cover rather than the GCLL or geologic store and release cover. The infiltration basins would be designed to both contain runoff and allow infiltration, as there would not be negative water quality connotations from contact with any seleniferous waste.

As described in **Section 2.4.4.2** of the FEIS, the lateral cover drain system of the GCLL would consist of a cover layer that is made up of a minimum of six inches of crushed drainage rock (chert or limestone), with a filter geotextile placed between the drainage layer and cover material to reduce migration of fines. Depending on the design and performance needs, a cushion geotextile may be placed above the GCLL to provide puncture protection from the crushed rock

drainage material. Lateral drains, consisting of corrugated polyethylene pipes, would be installed at specific distances along the slope within the drainage layer. The pipes would connect to down drains or outlets at surface water management features on the cover surface. The lateral cover drainage would be sized to accommodate the anticipated flow, as determined through modeling of the cover layers. Toe drains would be installed along the toe of the slope to allow the water collected in the drainage layer to be conveyed to the stormwater management features away from the cover area. The toe drains would be constructed of the crushed drainage rock, and separated from the overlying Dinwoody material and topsoil by a filter geotextile.

4.2 PANEL F AREA

In the Panel F area, the proposed modifications associated with the conveyor installation and operation would not significantly alter the existing water management practices for Panel F. One new containment pond would be constructed adjacent to the proposed ore stockpile located at the north end of Panel F. The stockpile and conveyor loading (ore feeder) area would be sloped to drain to the containment pond. The pond would be lined with a high density polyethylene geomembrane and designed to handle a 100-year, 24-hour storm event. Pond capacity would be 18.3 acre-feet and constructed to have a large surface area to allow for evaporation. Because the pond is designed to dry up every summer, it would include two evaporation misters. While one mister would be sufficient to aid in evaporation, two would be installed to ensure that all accumulated water is evaporated before freezing conditions occur, and that full capacity of the pond would be available going into the winter.

4.3 GENERAL BMPS RELATED TO WATER MANAGEMENT

In addition to the ponds, infiltration basins, and ditches, numerous other structural and operational BMPs are part of Simplot's water management program or indirectly contribute to its goals. Some of these are required by the Record of Decisions (RODs) (BLM 2008 and USFS 2008) for the original Panels F and G EIS and some are required by the Consent Order (IDEQ 2008). Still others are included in the SWPPP (Simplot 2008). These requirements include, among others:

- Locating runoff and sediment control facilities off ODAs to the extent feasible to reduce infiltration of collected water into seleniferous overburden;
- Controlling snow melt by placing snow stockpiles in areas where infiltration or mixing of snow or snow melt into/with external overburden is reduced to the extent practicable;
- Mining and disposing seleniferous overburden in a timely manner to reduce exposure of this material to surface weathering and oxidation;
- Reducing the surface area of seleniferous ODAs to the extent practicable to limit the amount of water infiltration and potential release;
- Inspecting the facilities daily to ensure activities comply with all approvals, permits, and regulations; and
- Inspecting, maintaining, and repairing water management structures to ensure functionality.

Further, Simplot routinely monitors and samples stormwater, groundwater, soil, sediment, aquatic biota, vegetation, and surface water, as required by the various permits and conditions of approvals. Water monitoring is described further in the following Section 4.4.

4.4 WATER MONITORING

The water quality monitoring plan prepared for the original Panels F and G FEIS addresses the concern that the Panels F and G activities could potentially impact groundwater and surface water quality by mobilizing selenium and other COPCs that are naturally present in mined materials. That plan was intended to compliment other ongoing water monitoring at the Smoky Canyon Mine. Simplot is required to maintain a comprehensive environmental monitoring plan for the entire Smoky Canyon Mine including Panels F and G. That monitoring plan is routinely revised and submitted to the Agencies for review.

Simplot also monitors stormwater that collects in various sediment ponds as required by EPA's NPDES MSGP. Selenium and total suspended solids are the pollutant parameters that are required to be sampled and reported under the terms of the MSGP (Simplot 2008).

CERCLA investigations include monitoring and data analyses focused on the portion of the Smoky Canyon Mine that is north of Panels F and G. The recent Revised Draft Smoky Canyon Mine Remedial Investigation/Feasibility Study (RI/FS) Remedial Investigation Report (Formation Environmental 2014) provides an extensive discussion of this data.

5.0 ADAPTIVE MANAGEMENT PLAN

Water management at the Smoky Canyon Mine has evolved over the years to respond to changing conditions and evolving understanding of site characteristics, particularly as more information from ongoing monitoring has become available. This will continue in the future throughout the existing mine, and this AMP details specific responses related to the Project. Several specific conditions and related responses are described below.

5.1 EXCEEDANCE OF BACKGROUND LEVELS

Section 400.06 of the Ground Water Quality Rule (GWQR) as discussed in the Consent Order (IDEQ 2008), allows an AME area within which elevated levels of naturally occurring constituents (NOCs) are not contaminants. The AME is identified in Figure 1 of the Panels F and G IDEQ Consent Order Water Quality Monitoring Plan (WQMP), incorporated by reference into the 2008 Consent Order. The AME is defined by reference to boundaries of property or leases held by Simplot. As the lease and mine plan modifications at Panel G would expand Simplot's lease area, the AME boundary would be updated by the submittal of a modified Figure 1 of the WQMP. In order to determine compliance outside of the AME, monitoring wells have been drilled in the Panels F and G area. Establishment of background levels of various constituents is key to determining compliance, and exceedance of background levels would instigate adaptive management response.

5.1.1 Condition

According to the Consent Order (IDEQ 2008), COPC concentrations in samples collected from the groundwater monitoring wells that have been designated as indicator wells within the defined AME area should, when analyzed as demonstrated using the methods specified by the WQMP, not exceed the background levels.

5.1.2 Response if Condition is Not Met

As per the Consent Order (IDEQ 2008), within 10 days of the receipt of such sample results, Simplot must provide written notification of the potentially elevated levels to the IDEQ, along with the analytical results from the laboratory and, within 60 days of receipt of the sample results, determine (through monitoring, modeling, or other generally accepted scientific methods) and notify IDEQ whether or not the NOCs are likely to exceed background levels at the boundary of the AME area. The RODs (BLM 2008 and USFS 2008) for the original Panels F and G EIS describes the re-sampling and statistical analysis required to support that determination. If Simplot or IDEQ determines that background levels are likely to be exceeded at the AME area boundary, Simplot must submit a report that addresses the criteria set forth in the GWQR, Section 58.01.11.400.02.b for IDEQ approval within 30 days of notification of determination by Simplot or IDEQ. If IDEQ then notifies Simplot that the degradation represented by the elevated levels of NOCs is "significant," Simplot must, within 60 days of the notice, submit a plan for IDEQ's approval describing the actions proposed to be taken in response to the degradation consistent with the GWQR, Section 58.01.11.400.02.a. The plan must take into consideration the action options set forth in the WQMP that is Attachment 1 of the Consent Order and also is incorporated into the current comprehensive environmental monitoring plan for Smoky Canyon Mine.

5.2 EXCEEDANCE OF GROUNDWATER QUALITY STANDARDS

Similar to Section 5.1, the Consent Order (IDEQ 2008) describes the conditions for evaluating compliance with the GWQR for monitoring wells that have been drilled in and outside of the Panels F and G AME area. Based on water quality modeling, actual monitoring, and operating experience, mining in Panels F and G was not anticipated to result in levels of NOCs exceeding numeric groundwater quality standards in the indicator wells developed in the Wells Formation aquifer (IDEQ 2008). The lease and mine plan modifications proposed by the Project are not anticipated to result in any exceedances and the use of a GCLL would further minimize contamination of surface and groundwater. Any exceedance of groundwater quality standards would trigger adaptive management response. Adaptive management has been considered in that event.

5.2.1 Condition

According to the Consent Order (IDEQ 2008), COPC concentrations in samples collected from the groundwater indicator wells within the defined AME area should not exceed numeric groundwater quality standards.

5.2.2 Response if Condition is Not Met

As per the Consent Order (IDEQ 2008), Simplot must, within 10 days of receipt of such sample results, provide written notification of the potentially elevated levels to IDEQ along with the analytical results from the laboratory and, within 60 days of receipt of sample results, determine (through monitoring, modeling, or other generally accepted scientific methods) and notify the IDEQ whether or not the numeric groundwater quality standards are likely to be exceeded at the boundary of the AME area. In addition, if samples taken from monitoring wells outside the AME area exceed the numeric groundwater quality standards, Simplot must, within 10 days of receipt of such sample results, provide written notification of the potentially elevated levels to IDEQ along with the analytical results from the laboratory.

Further, unless directed otherwise in writing by IDEQ, Simplot must, within 60 days of determining and notifying IDEQ whether or not the numeric groundwater quality standards are likely to be exceeded at the boundary of the AME area, or that the groundwater quality standards are exceeded in monitoring wells outside the AME area, prepare and submit to IDEQ for approval a corrective action plan (CAP). The CAP would describe the actions Simplot proposes to take in response to the elevated levels of NOCs, which may include, but are not limited to, modifications to the cover system. The CAP would evaluate and address those actions necessary to investigate and evaluate the contamination, including the potential for contamination of surface waters (including the possible construction of other monitoring wells and/or modeling to determine the extent of contamination), to prevent further contamination, and to cleanup or mitigate existing contamination. The CAP would consider the action options set forth in the WQMP.

A cost estimate for investigating and evaluating mitigation of the contamination (including the possible construction of other monitoring wells and/or modeling to determine the extent of contamination) would also be submitted to IDEQ. Upon completion of investigating and evaluating the contamination, Simplot would submit an estimate of the costs of cleaning up or mitigating the existing contamination.

5.3 ELEVATED COPC CONCENTRATIONS IN SURFACE WATER

Monitoring at several surface water locations in the Deer Creek, Wells Canyon, and Stewart Canyon watersheds (BLM and USFS 2007) will allow: changes in surface water quality and quantity associated with the mine operations to be detected; compliance with the Clean Water Act and Idaho surface water quality standards downstream of mine operations to be demonstrated; empirical surface water monitoring data to be compared with impact results predicted in the FEIS (BLM and USFS 2007); and the effectiveness of mitigations applied at the mine to protect surface water quality from sediment and chemical pollutants.

5.3.1 Condition

The surface water monitoring data evaluation, including trend analysis should indicate no statistically significant change in COPC concentrations compared to baseline conditions.

5.3.2 Response if Condition is Not Met

If data indicate that there is a statistically significant change in COPC concentrations, which could indicate impacts from the Project, sampling frequency will increase and if necessary Simplot will take actions which at minimum will include determination of the source of the release and development of preventative and response measures to address the release, as described in the ROD (BLM 2008). If long-term monitoring reveals that there is a statistically significant change in COPC concentrations occurring to surface water and springs, Simplot will be required to clean up the water chemistry (BLM 2008 and USFS 2008).

5.4 UNDERPERFORMANCE OF COVER

As described by the Agency Preferred Alternative in the FEIS, both the previously-approved geologic store and release cover and a GCLL would be used at Panel G. The ROD (BLM 2008) for the original Panels F and G EIS identified monitoring the percolation rate through the geologic store and release cover as a key indicator for potential impacts to groundwater and surface water quality. Appendix 2E of the 2007 FEIS describes quality assurance and quality control (QA/QC) requirements for construction and monitoring of the geologic store and release cover. Cover performance monitoring as required by the ROD (BLM 2008) is ongoing, and is key to maintaining the ability of the cover to be adaptively managed.

Similar requirements would be required for construction and monitoring of the GCLL. A final design report and monitoring program for the GCLL would be prepared and submitted by Simplot for review by the BLM, USFS, and IDEQ (the Agencies). Agency approval would be required prior to implementing any construction activities for the GCLL. Simplot would provide funding to the Agencies, through a cost-recovery agreement, to pay for an agency-selected third-party licensed engineer with experience in cover design and QA/QC methods to assist and advise the Agencies with construction and monitoring activities. The GCLL would be constructed in phases and during specific seasons as described in the FEIS to minimize infiltration of snowmelt and stormwater.

5.4.1 Condition

Monitoring of the approved geologic store and release cover and associated lysimeter would continue to be conducted as specified in Appendix 2E of the original Panels F and G FEIS (BLM and USFS 2007). This monitoring will determine if there is any variance between the modeled and actual cover performance.

Simplot would be required to develop a construction quality control (CQC) plan for the GCLL. The CQC plan would outline the monitoring activities and testing requirements to be performed by Simplot to demonstrate the constructed cover would meet the requirements of the approved design. Technical specifications would be developed to define the construction materials and methodology and performance requirements.

In addition, following construction and installation of the GCLL, monitoring activities would be implemented to ensure the GCLL is performing as designed. Monitoring activities would include:

- Routine sampling of the two Panel G Consent Order groundwater monitoring wells, situated northeast of the East ODA, referred to as MW-G-1 (indicator well) and MW-G-1A (downgradient well).
- Routine visual inspections of the cover surface to identify changes (i.e. sloughing, fissures, or slumping due to mass movement, distortion due to differential settlement, excessive or focused erosion, or the presence of cracks).

5.4.2 Response if Condition is Not Met

In the event that monitoring indicates the covers are not meeting the performance standards specified by the manufacturer and the long-term environmental effects of the variances were considered to be significant, the Agencies and Simplot would determine what changes would be necessary to maintain compliance with applicable water quality standards as per the ROD (BLM 2008).

5.5 BREAKTHROUGH OF INFILTRATED WATER THROUGH ODAS

As required by the 2008 BLM ROD, Simplot must inspect the areas along the outer toes and slopes of all external ODAs on a monthly basis during snow free periods to look for indications of seeps or springs discharging from the overburden. This requirement would also apply to the expanded East ODA associated with the Project.

5.5.1 Condition

The ODA design and water management practices should prevent seep/spring issuances at the toe or surface slopes of these features.

5.5.2 Response if Condition is Not Met

Any such newly identified seepage locations would be captured and/or conveyed as needed. They would be added to the surface water monitoring stations in order to determine and track the presence of COPCs as well as discharge rates.

6.0 NOTIFICATION

Simplot must meet all of the notification requirements previously summarized in Section 5**,** those fully described in the original Panels F and G FEIS and associated ROD (BLM and USFS 2007; BLM 2008), the Consent Order (IDEQ 2008), and the 2014 FEIS for the Project (BLM and USFS 2014).

7.0 REFERENCES

BLM (Bureau of Land Management). 2008. Record of Decision Environmental Impact Statement Smoky Canyon Mine, Panels F and G. June 6, 2008.

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USFS. 2008. Record of Decision. Smoky Canyon Mine, Panels F and G Authorization of Off-Lease Activities. June 2008.

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APPENDIX A FIGURES

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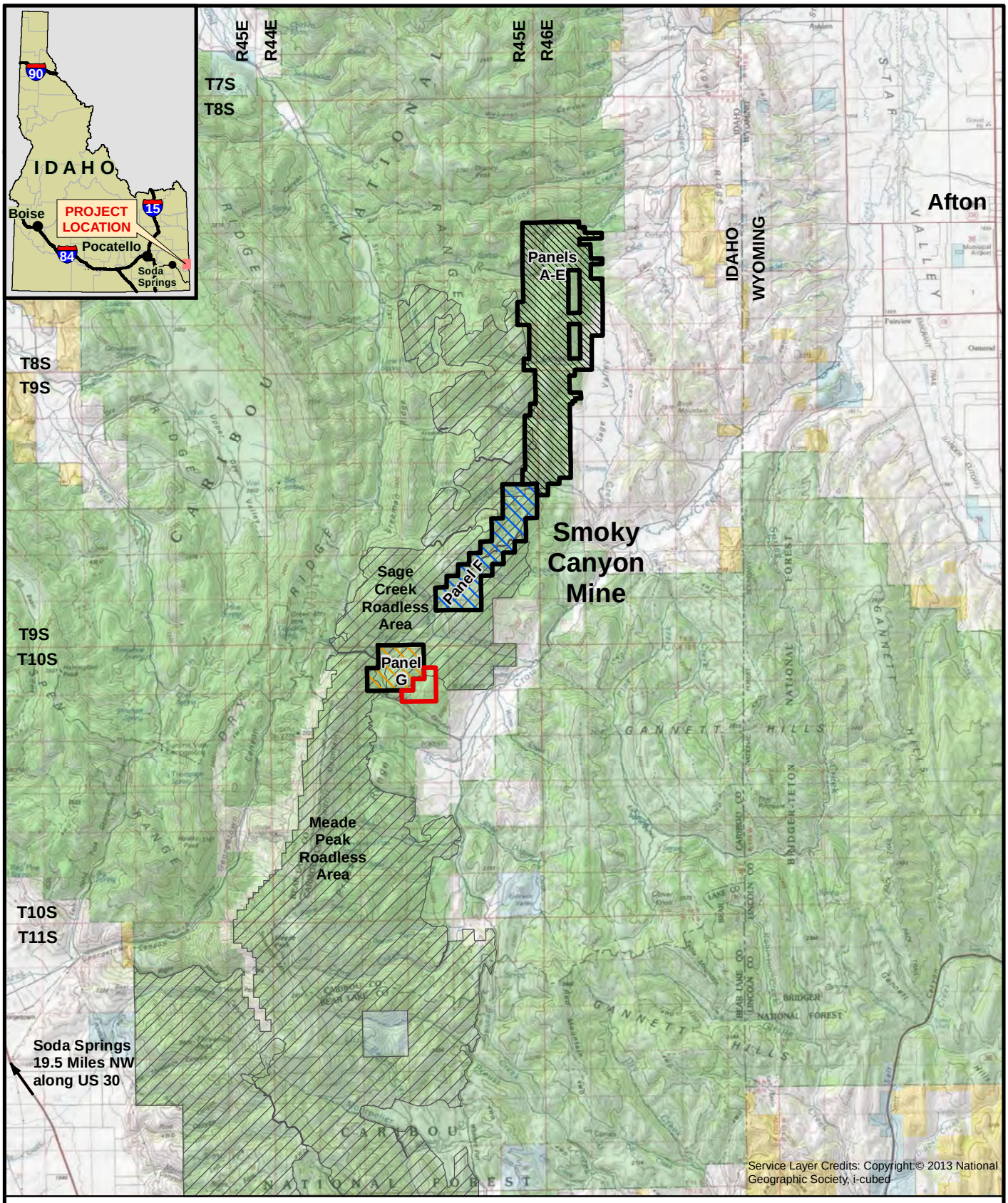


Explanation

- Smoky Canyon Mine
- Panel F (Lease IDI-27512)
- Panel G (Lease IDI-01441)
- Proposed Lease Modification Area
- Roadless Area

Land Ownership

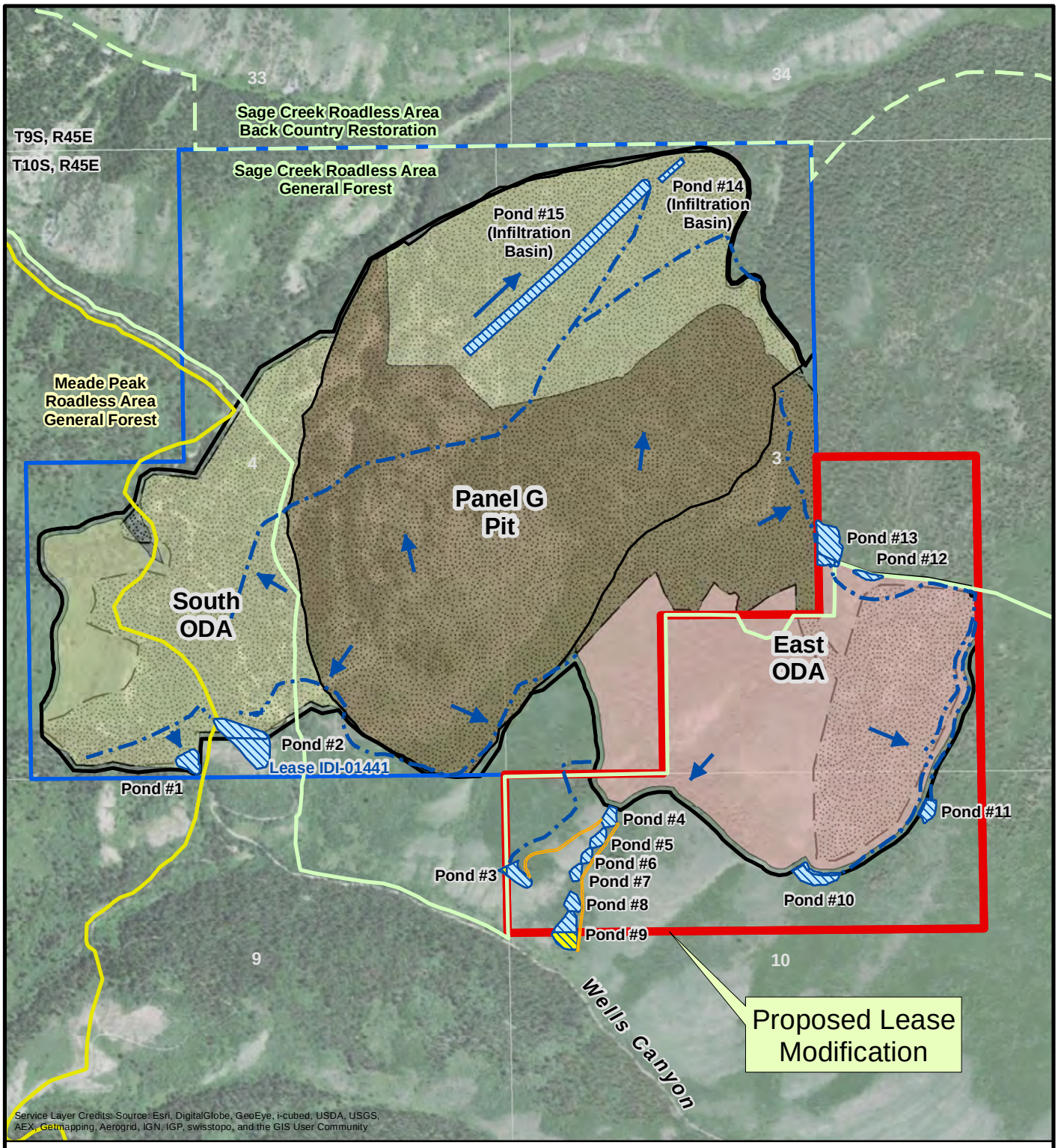
- BLM
- Private
- State
- USFS

N

3 0 3 Miles

Figure 1
General Project Area
Panel F & G Lease/Mine Plan Modifications
Adaptive Management Plan

Document Path: X:\IDClients\JR_Simplot\PanenG_LeaseMod_ExpansionConveyorProject\MXDs\AdaptiveManagementPlan\Figure 1 General Project Area.mxd



Explanation

- Panel G Reduced Disturbance Boundary
- Panel G Pit Boundary
- Proposed Lease Modification Area (240 acres)
- JR Simplot Lease
- Approved Panel G Disturbance
- GCLL (138 acres)
- Geologic Store and Release Cover (257.3 acres)
- Topsoil Cover (222.6 acres)
- Sage Creek Roadless Area
- Meade Peak Roadless Area
- Proposed Stormwater Control Ditch (On Lease)
- Proposed Stormwater Control Pond (On Lease)
- Proposed Stormwater Control Road Disturbance (On Lease)
- Proposed Stormwater Control Pond (Off Lease)
- Proposed Stormwater Control Road Disturbance (Off Lease)
- General Direction of Runoff (Post-Reclamation)

N

1,200 0 1,200 Feet

Figure 2
Agency Preferred Alternative:
Reduced East ODA with Mixed Cover
Panel F & G Lease/Mine Plan Modifications
Adaptive Management Plan

Document Path: X:\IDClients\JR_Simplot\PanenG_LeaseMod_ExpansionConveyorProject\MXDs\AdaptiveManagementPlan\Figure 2 Agency Preferred Alternative Reduced East ODA with Mixed Cover.mxd